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February 8, 2008

VIA FACSIMILE

Hon. Stephen C. Robinson
United States Courthouse
300 Quarropas St., Room 633
White Plains, NY 10601

MEMO ENDORSI

Re: Bennie Willis v. Landamerica Onestop, Inc., et al.
Case No. : 07 CV 3646 (SCR)
Our File No. : 01224.00580

Dear Judge Robinson:

We represent defendant Acranel Mortgage Settlement Solutions, LLC d/b/a Acranel Lendserv ("Lendserv") in the referenced action. We write, on the consent of all parties, to the Court to request a final sixty-day extension for the completion of depositions (and as a result, a sixty-day extension to complete all discovery). In this action, plaintiff has alleged that the defendants failed to issue a title insurance policy to the plaintiff when he purchased a home in Rockland County. Plaintiff claims that when the house was damaged by fire, he suffered damages as a result of the lack of having the title insurance.

As plaintiff's counsel indicated in her prior letter to the Court, the parties did engage in settlement negotiations but were unable to reach a resolution. Accordingly, we proceeded with party depositions which were completed last month. During the course of those depositions, we discovered that several additional depositions would be necessary – all outside of the state and some requiring subpoenas. During plaintiff's deposition, defendants learned, for the first time, that plaintiff essentially had no personal involvement in the alleged purchase of the property at issue as well as any substantive involvement in the handling of the property and mortgage issues after the fire. Plaintiff disclosed in his deposition that these activities were primarily handled by individuals who are not parties to the lawsuit, his son-in-law, Terry Metheny, his wife, and his daughter. All three of these individuals reside in the State of Arkansas and will require subpoenas.

At the same time, plaintiff has indicated a desire to depose two additional witnesses from Lendserv in Pittsburgh, Pennsylvania. No subpoenas will be required for these two witnesses. In addition, we are also attempting to secure the non-party depositions of the two individuals (Richard and Laura Rovegno) who sold plaintiff the property and were living at the property at the time of the fire pursuant to a leaseback agreement. The Rovegnos are in default in this action.

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but we believe that their testimony is important and would like the opportunity to try to secure their testimony as non-party witnesses.

Finally, the parties have agreed that the assistance of a Magistrate in an attempt to mediate this claim would be helpful. Accordingly, all parties are requesting that the Court refer the matter for mediation upon the completion of depositions, preferably the week of April 21, 2008.

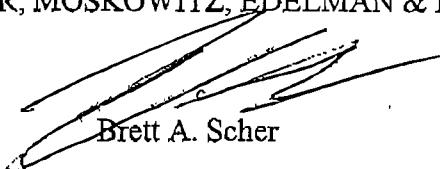
If the Court approves, the new scheduling dates would be as follows:

4/15/08	Last day to complete depositions
5/15/08	Last day to serve Interrogatories and Requests to Admit
6/18/08	Last day to complete all fact discovery

Should the Court have any questions or need any additional information, please contact the undersigned.

Respectfully yours,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP


Brett A. Scher

Enclosure

cc: John Piskora, Esq. (via fax)
Diane McFadin, Esq. (via fax)

The parties' request is granted as to the extension of discovery deadlines. The new dates are as stated in bracketed text above.

APPLICATION GRANTED
Stephen C. Robinson

HON. STEPHEN C. ROBINSON
2/19/08